



UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

RUBIN YOUNG, SYBEL W. LEE,
KEITH WILSON, WILLIE A. THOMAS et al.,

Case No.: 25-cv-23025

Plaintiffs,

v.

HON. DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES;
HON. PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES;
HON. SCOTT TURNER, SECRETARY OF HOUSING AND URBAN DEVELOPMENT;
HON. RON DESANTIS, GOVERNOR OF THE STATE OF FLORIDA;
HON. JAMES UTHMEIER, ATTORNEY GENERAL OF FLORIDA;
HON. DANIELLA LEVINE CAVA, MAYOR OF MIAMI-DADE COUNTY, et al.,

Defendants,

**MOTION FOR DEFAULT AGAINST DEFENDANT DANIELLA LEVINE
CAVA**

COMES NOW, Plaintiffs, Rubin Young, Sybel W. Lee, Keith Wilson, and Willie A. Thomas, pro se, respectfully move this Court for an order of default against Defendant, Mayor Daniella Levine Cava, pursuant to Federal Rule of Civil Procedure 55(b), for her failure to plead or otherwise defend against the Complaint in this action.

In support of this Motion, Plaintiffs state as follows:

1. Plaintiffs filed their Summons and Complaint in this action on July 21, 2025.
2. Defendant, Daniella Levine Cava, was duly served in her official capacity via Certified Mail, Priority Mail, and Green Card Receipt on July 23, 2025, at 3:57 PM at 111 NW 1st Street, 29th Floor, Stephen P. Clark Government Center, Miami, FL 33128. The tracking number for the certified mail is 9589071052702675356335.

3. Pursuant to Rule 12 of the Federal Rules of Civil Procedure, the Defendant had 21 days from the date of service to file an answer, motion, or otherwise respond to the Complaint. As of this date, Defendant has not filed any response, and the 21-day period has expired.
4. Defendant has failed to plead or otherwise defend this case, and as such, Plaintiffs requests that the Clerk of Court enter default against Defendant Mayor Daniella Levine Cava.

WHEREFORE, Plaintiffs respectfully request that this Court enter default against Defendant Mayor Daniella Levine Cava, for such further relief as the Court deems just and proper on behalf of the Indigenous of America peoples and the descendants of formerly enslaved African Americans—respectfully pray that this Honorable Court issue a judgment that does not merely resolve a complaint, but restores historical truth, legal clarity, and national integrity.

The Plaintiffs request that the Court **GRANT** the following relief, separate in application but equal in moral weight, and designed to remedy centuries of state-sanctioned erasure, economic subjugation, and constitutional betrayal:

I. CLASS CERTIFICATION

Pursuant to Federal Rule of Civil Procedure 23, certify this action as a class action on behalf of:

- **Class A:** All Indigenous of America peoples and their nations who have suffered dispossession, cultural genocide, denial of sovereignty, and forced displacement.
- **Class B:** All descendants of emancipated African slaves born or residing in the United States who continue to endure the unredressed consequences of chattel slavery, Jim Crow apartheid, and 14th Amendment misinterpretation.

II. DECLARATORY RELIEF: RESTORING SOVEREIGNTY AND CITIZENSHIP CLARITY

a. For Indigenous Peoples

Declare that Indigenous of America peoples are sovereign nations with inherent rights to land, governance, and self-determination, rooted in natural law and treaty obligations— independent of the 13th, 14th, or 15th Amendments.

b. For Descendants of Freedmen

Declare that the 14th Amendment's Citizenship Clause was intended exclusively to protect formerly enslaved African Americans and their descendants and was never designed to confer automatic citizenship on the children of undocumented immigrants, foreign nationals, or sovereign tribal members outside the jurisdiction of U.S. law.

III. INJUNCTIVE RELIEF: HALTING CONTINUED ABUSES

Issue permanent injunctions to prohibit:

• a. **Unlawful Interpretation of the 14th Amendment**

Bar federal, state, and local authorities from expanding the Citizenship Clause to include individuals not lawfully subject to U.S. jurisdiction at birth.

• b. **Land and Cultural Exploitation**

Halt all current and future land seizures, displacement programs, cultural commodification, or gentrification projects targeting Indigenous and African-descended communities.

• c. **Federal Funds Misallocation**

Prohibit the diversion of CDBG, HUD, Economic Opportunity Act, and similar federal grants intended for these communities to agencies, developers, or recipients lacking proper eligibility or cultural alignment.

• d. **Misadministration of Community Funds**

Mandate community-led governance over all federal programs affecting Indigenous or African-descended peoples, including control of how funds are allocated, spent, and monitored.

IV. RESTORATION AND REPARATIONS: TANGIBLE REDEMPTION

a. Indigenous of America Peoples

- Restore land titles and tribal sovereignty where rightful claims exist.
- Reaffirm treaty protections, jurisdictional authority, and control over natural resources.

b. Descendants of Enslaved Africans

- Order a one-time federal reparations award of \$30 trillion, representing a calculated measure of unpaid labor, generational theft, racial terrorism, and institutionalized exclusion.
- Establish annual reparations payments of \$500 billion, retroactive to 1868, to directly redress ongoing harm.
- Create Guaranteed Income Programs, Sovereign Economic Development Zones, Black-owned and Indigenous-owned Banking Initiatives, Educational Trusts, Housing Reparations, and Business Capital Access Programs tailored specifically for these harmed classes.

V. RECOGNITION OF HISTORICAL LEADERSHIP AND CULTURAL PRESERVATION

a. Legacy Restoration

Reinstate the name, work, and legacy of Mrs. Mary L. Hill and other erased or undermined leaders who pioneered anti-poverty, economic empowerment, and civil rights programs—especially under the Economic Opportunity Acts of 1964–1978.

- b. **National Archival Memorialization**

Establish a permanent national museum, archive, and public scholarship program dedicated to the history, contributions, and sacrifices of Indigenous peoples and descendants of enslaved Africans—funded and managed by their own communities.

VI. TRUTH AND RECONCILIATION COMMISSION WITH ENFORCEMENT POWER

Create a federally funded, independent Truth and Reconciliation Commission, empowered to:

- Investigate historical atrocities and their current legal, economic, and public health consequences.
- Conduct public hearings, collect testimony, and ensure full transparency.
- Oversee and enforce the implementation of reparative action plans approved by this Court.

VII. ACCOUNTABILITY IN GOVERNANCE AND FUND ADMINISTRATION

- a. Bar non-citizens or ineligible individuals from holding public offices that administer, allocate, or influence federal or local funding meant for Indigenous or African-descended communities.
- b. Impose qualifications requiring documented cultural and ancestral ties to the affected communities before individuals or organizations may direct such funding.

VIII. AUDITS, COMPLIANCE, AND TRANSPARENCY

Order the U.S. Government Accountability Office (GAO) to perform comprehensive forensic audits of:

- All CDBG, HUD, and Economic Opportunity Act disbursements from 1970 to present.
- Misallocation, political manipulation, or unauthorized use of funds intended for protected classes.

- Publicly report findings with a mandate for prosecution or civil penalties in cases of fraud, abuse, or racial diversion.

IX. LEGAL COSTS AND FURTHER EQUITABLE RELIEF

Award all costs of litigation, including:

- Attorney fees, expert witness expenses, filing costs, and service fees.
- Ongoing monitoring mechanisms to ensure compliance with judicial orders.
- Any additional relief this Court deems just and necessary to effectuate true and lasting justice, as envisioned by both the spirit of the Constitution and the moral weight of history.

15

Respectfully Submitted on September 2, 2025.

Signature:

Rubin Young, Pro Se Plaintiff
14060 SW 258th Street
Homestead, FL 33032
786-847-9111
commtrus@yahoo.com

CERTIFICATE OF COMPLIANCE

I hereby certify that this document complies with the type-volume limitation set forth in the Local Rules of the Southern District of Florida and Federal Rule of Civil Procedure 23. This complaint contains 1,670 words, excluding the parts exempted by the Rules.

15

Respectfully Submitted on September 2, 2025.

Signature:

Rubin Young, Pro Se Plaintiff
14060 SW 258th Street
Homestead, FL 33032
786-847-9111
commtrus@yahoo.com

CERTIFICATE OF INTERESTED PARTIES

Pursuant to Local Rule 7.1(a)(2)

The undersigned, pursuant to Local Rule 7.1(a)(2), hereby certifies that the following individuals, entities, and government officials are believed to have a direct financial, administrative, legal, political, or constitutional interest in the outcome of this case. Each named party, whether as defendant or agency representative, is hereby recognized as having a right to full equal protection under the law, access to due process, and an interest in the equitable administration of justice arising from the relief sought:

Plaintiffs:

- Rubin Young
- Sybel W. Lee
- Keith Wilson,
- Wille A. Thomas

Defendants:

- President Donald J. Trump (United States of America)
- HUD (Scott Turner)
- DOJ (Pam Bondi, Jody Hunt)
- State of Florida (Ron DeSantis, James Uthmeier)
- Miami-Dade County (Daniella Levine Cava, Juan Fernandez-Barquin, Pedro J. Garcia)
- Board of County Commissioners and Dept. Heads

Note:

All listed parties are considered integral to the constitutional questions, statutory claims, and equitable remedies raised in this case. Each bears a potential or actual role in policy implementation, resource distribution, regulatory enforcement, and historical redress. All are

entitled to equal protection and transparency as required under the U.S. Constitution, federal law, and international human rights norms.

Respectfully Submitted on September 7, 2025.

Signature: _____
Rubin Young, Pro Se Plaintiff
14060 SW 258th Street
Homestead, FL 33032
786-847-9111
commtrus@yahoo.com

CERTIFICATE OF SERVICE

I certify, that a copy of this complaint has been served on all parties via [U.S. mail/fax/email] on September 2, 2025.

- President Donald J. Trump (United States of America)
- HUD (Scott Turner)
- DOJ (Pam Bondi, Jody Hunt)
- State of Florida (Ron DeSantis, James Uthmeier)
- Miami-Dade County (Daniella Levine Cava, Juan Fernandez-Barquin, Pedro J. Garcia)
- Board of County Commissioners and Dept. Heads

Respectfully Submitted on September 7, 2025.

Signature: _____
Rubin Young, Pro Se Plaintiff
14060 SW 258th Street
Homestead, FL 33032
786-847-9111
commtrus@yahoo.com

STATEMENT OF INTEGRITY

I, Rubin Young, Pro Se Plaintiff, hereby declare under penalty of perjury under the laws of the United States of America that the foregoing statements, arguments, and factual assertions contained in this Complaint and Memorandum of Law are true and correct to the best of my

knowledge, information, and belief. This document is prepared with the utmost respect for the truth, legal standards, and historical accuracy.

No material fact has been knowingly omitted or misstated. This filing represents a sincere and good-faith effort to seek justice for the Indigenous of America peoples and descendants of enslaved Africans, to uphold constitutional principles, and to promote equitable remedies based on documented historical and legal grounds.

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Respectfully submitted on September 2, 2025

Signature: _____
Rubin Young/s/, Pro Se Litigant
14060 SW 258th Street
Homestead, FL 33032
786-847-9111
commtrus@yahoo.com

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

RUBIN YOUNG, SYBEL W. LEE,
KEITH WILSON, WILLIE A. THOMAS et al.,

Case No.: 25-cv-23025

Plaintiffs,

v.

HON. DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES;
HON. PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES;
HON. SCOTT TURNER, SECRETARY OF HOUSING AND URBAN DEVELOPMENT;
HON. RON DESANTIS, GOVERNOR OF THE STATE OF FLORIDA;
HON. JAMES UTHMEIER, ATTORNEY GENERAL OF FLORIDA;
HON. DANIELLA LEVINE CAVA, MAYOR OF MIAMI-DADE COUNTY, et al.,

Defendants,

**PLAINTIFFS' MOTION FOR DEFAULT AGAINST GOVERNOR RON DESANTIS
AND MAYOR LEVINE CAVA**

COMES NOW, Plaintiffs, Rubin Young, Sybel W. Lee, Keith Wilson, and Willie A. Thomas, Pro Se, respectfully move this Court for entry of default against Defendants Governor Ron DeSantis and Mayor Danielle Levine Cava pursuant to Federal Rule of Civil Procedure 55(a), and state as follows:

1. Service of Process

Plaintiffs properly affected services of the Summons and Complaint upon **Mayor Danielle Levine Cava on July 23, 2025**, at the **Stephen P. Clark Government Center**, located at **111 NW 1st Street, Miami, FL 33128**, via **Certified Mail through USPS Priority Mail**, tracking number **9589071052702675356335**. Proof of delivery was obtained through the **USPS Online Tracking System**, and is attached hereto as **Exhibit E**. A return green card receipt was not used.

Plaintiffs also properly served the Summons and Complaint upon **Governor Ron DeSantis** on **July 31, 2025**, at **The Capitol, 400 S. Monroe Street, Tallahassee, FL 32399-0001**, via **Certified Mail through USPS Priority Mail**, tracking number **9589071052702675356236**. Proof of delivery was obtained via the **USPS Online Tracking System**, and is attached hereto as **Exhibit F**. A return green card receipt was not used.

2. Expiration of Time to Respond

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), Defendants had 21 days to file a response to the Complaint.

More than 21 days have passed, and neither Governor DeSantis nor Mayor Levine Cava have filed an answer or other responsive pleading.

3. Nature of the Case

This action seeks enforcement of existing laws related to ending birthright citizenship for illegal immigrants and protecting the rights of Indigenous peoples of America.

Plaintiffs are not seeking personal damages; this is a matter of public interest, asking the courts to direct the government to enforce laws already in place.

4. Request for Entry of Default

Because Defendants have failed to respond within the required time frame, Plaintiffs request that the Court enter default against Governor Ron DeSantis and Mayor Danielle Levine Cava.

WHEREFORE, Plaintiffs respectfully request that the Court:

1. Enter default against Governor Ron DeSantis and Mayor Danielle Levine Cava for failure to respond to the Complaint.
2. Grant such other relief as the Court deems just and proper.

Respectfully Submitted on August 21, 2025

Signature:

Rubin Young, Pro Se Plaintiff
14060 SW 258th Street
Homestead, FL 33032
786-847-9111
commtrus@yahoo.com

CERTIFICATE OF COMPLIANCE

I hereby certify that this document complies with the type-volume limitation set forth in the Local Rules of the Southern District of Florida and Federal Rule of Civil Procedure 23. This complaint contains 838 words, excluding the parts exempted by the Rules.

Respectfully Submitted on August 21, 2025

Signature:

Rubin Young, Pro Se Plaintiff
14060 SW 258th Street
Homestead, FL 33032
786-847-9111
commtrus@yahoo.com

CERTIFICATE OF INTERESTED PARTIES

Pursuant to Local Rule 7.1(a)(2)

The undersigned, pursuant to Local Rule 7.1(a)(2), hereby certifies that the following individuals, entities, and government officials are believed to have a direct financial, administrative, legal, political, or constitutional interest in the outcome of this case. Each named party, whether as defendant or agency representative, is hereby recognized as having a right to full **equal protection under the law, access to due process, and an interest in the equitable administration of justice** arising from the relief sought:

Plaintiffs:

- Rubin Young
- Sybel W. Lee
- Keith Wilson
- Willie A. Thomas

Defendants:

- President Donald J. Trump (United States of America)
- HUD (Scott Turner)
- DOJ (Pam Bondi, Jody Hunt)
- State of Florida (Ron DeSantis, James Uthmeier)
- Miami-Dade County (Daniella Levine Cava, Juan Fernandez-Barquin, Pedro J. Garcia)
- Board of County Commissioners and Dept. Heads

Note:

All listed parties are considered integral to the constitutional questions, statutory claims, and equitable remedies raised in this case. Each bears a potential or actual role in policy implementation, resource distribution, regulatory enforcement, and historical redress. All are entitled to equal protection and transparency as required under the U.S. Constitution, federal law, and international human rights norms.

Respectfully Submitted on August 21, 2025

Signature: _____

Rubin Young, Pro Se Plaintiff
14060 SW 258th Street
Homestead, FL 33032
786-847-9111
commtrus@yahoo.com

CERTIFICATE OF SERVICE

I certify that a copy of this complaint has been served on all parties via [U.S. mail/fax/email] on August 21, 2025.

- Donald J. Trump, The White House

- Pam Bondi, U.S. Department of Justice
- Scott Turner, U.S. HUD
- Ron DeSantis, Governor of Florida
- James Uthmeier, Florida Attorney General
- Daniella Levine Cava, Mayor of Miami-Dade

Respectfully Submitted on August 21, 2025

Signature:

Rubin Young/s

Pro Se Plaintiffs, et. al.

14060 SW 258th Street

Homestead, FL 33032

786-847-9111

commtrus@yahoo.com

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
Southern District of Florida

RUBIN YOUNG, SYBEL W. LEE, KEITH WILSON,
WILLIE A. THOMAS ET. AL.

1

Plaintiff(s)

v

DANIELLE LEVINE CAVA IN HER OFFICIAL
CAPACITY AS MAYOR OF MIAMI-DADE COUNTY

Civil Action No. 25-CV-23025

Defendant(s)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Mayor Daniella Levine Cava
In her official capacity as Mayor of Miami-Dade County

**Stephen P. Clark Center
111 NW 1st Street, 29th Floor
Miami, FL 33128**

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

RUBIN YOUNG, ET. AL.
14060 SW 258TH STREET, #308
HOMESTEAD, FL 33032

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Angela E. Noble

CLERK OF COURT

[Handwritten signature of Clerk or Deputy Clerk]

Date: 07/18/2025

Exh. b. + 11



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